1 2 3 4 5 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 6 AT TACOMA 7 8 LOCALS 302 AND 612 OF THE INTERNATIONAL UNION OF OPERATING 9 No. 2:20-cy-00472-RSL ENGINEERS CONSTRUCTION INDUSTRY HEALTH AND SECURITY FUND; LOCALS 10 STIPULATION AND ORDER 302 AND 612 OF THE INTERNATIONAL **EXTENDING NESS & CAMPBELL** UNION OF OPERATING ENGINEERS-11 **CRANE, INC.'S TIME TO RESPOND** EMPLOYERS CONSTRUCTION INDUSTRY TO COMPLAINT 12 RETIREMENT FUND; and WESTERN WASHINTON OPERATING ENGINEERS-13 EMPLOYERS TRAINING TRUST FUND, 14 Plaintiff, 15 v. 16 NESS & CAMPBELL CRANE, INC. an Oregon 17 corporation, 18 Defendant. 19 20 The parties, by and through their counsel, stipulate and agree as follows: 21 1. Plaintiff filed this lawsuit on March 17, 2020, and served Defendant with 22 the Summons and Complaint on April 9, 2020. 23 2. Under Fed. R. Civ. P. 12(a)(1)(A)(i), Defendant's deadline to respond to 24 the complaint is April 30, 2020. 25 26 27 STIPULATION AND ORDER EXTENDING DEF'S TIME TO RESPOND TO COMPLAINT

(2:20-cv-00472-RSL) — 1

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Davis Wright Tremaine LLP

LAW OFFICES
Suite 1500
929 108th Avenue NE
Bellevue, WA 98004
425.646.6100 main · 425.646.6199 fax

1	3. In order to allow the parties the opportunity to resolve this matter, the	
2	parties stipulate and agree to extend the Defer	ndant's deadline to respond to the complaint
3	by 90 days, from April 30, 2020, to July 29, 2	2020.
4	IT IS SO STIPULATED.	
5	DATED this 30th day of May, 2020.	
6		DAVIS WRIGHT TREMAINE, LLP
7		Attorneys for Defendant Ness & Campbell Crane, Inc.
8		Dy /c/ Pichard I Dirmingham
9		By /s/ Richard J. Birmingham Richard J. Birmingham, WSBA #8685 920 Fifth Avenue, Suite 3300
10		Seattle, WA 98104-1610 Telephone: 206-757-8145
11		Fax: 206-757-7145 E-mail: richbirmingham@dwt.com
12		
13		By <u>/s/ Christine Hawkins</u> Christine Hawkins, WSBA #44972
14		929 108 <sup>th</sup> Avenue NE, Suite 1500 Bellevue, WA 98004
15		Telephone: 425-646-6112 Fax: 425-646-6199
16		E-mail: christinehawkins@dwt.com
17		REID, McCARTHY, BALLEW &
18		LEAHY, LLP
19		Attorneys for Plaintiffs Locals 302 and 612 of the International Union of Operating
20		Engineers Construction Industry Health and Security Fund, Locals 302 and 612 of
21		the International Union of Operating Engineers-Employers Construction
22		Industry Retirement Fund, and Western Washington Operating Engineers-
23		Employers Training Trust Fund
24		By <u>/s/ Russell J. Reid</u> Russell J. Reid, WSBA #2560
25		100 West Harrison Street North Tower, #300
26		Seattle, WA 98119
27		
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1	<u>ORDER</u>	
2	Based on the foregoing Stipulation, the Court ORDERS that the deadline for the	
3	Defendant to respond to the complaint is extended from April 30, 2020, to July 29, 2020.	
4	IT IS SO ORDERED.	
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6	Dated this 1st day of May, 2020.	
7	MWS Casnik	
8	Robert S. Lasnik	
9	United States District Judge	
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